

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH
FILED
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DEPUTY CLERK

UNITED STATES OF AMERICA

v.

TERRANCE HENDERSON (01)
YASMINE VILLASANA (02)
THADDEAUS HENDERSON (03)
KANDRA MCKINNEY (04)

No. **4-14 CR-137-0**

INDICTMENT

The Grand Jury Charges:

INTRODUCTION

At all times material to this Indictment:

1. T-Mobile is a telecommunications company doing business in the State of Texas and elsewhere. Retailers such as Wal-mart, Sam's Club, Radio Shack, and Best Buy sell wireless equipment to T-Mobile customers. Customers who qualify for post-paid service through a credit check and choose a two-year service contract may receive a discounted or free cellular phone.

2. In order for a customer to sign up for the T-Mobile subscription, the customer needed to demonstrate credit-worthiness. Authorized T-Mobile dealers could contact T-Mobile for activations and pre-run credit applications of customers. To pre-run credit applications, T-Mobile required customer information that included that customer's social

security account number (SSAN). Based on the credit score, a customer could qualify for activation of multiple phone service subscriptions.

[Remainder of page intentionally left blank]

Count One

Conspiracy to Commit Social Security Fraud
(Violation of 18 U.S.C. § 371 (42 U.S.C. § 407(a)(B))

1. The Grand Jury realleges and incorporates the Introduction.
2. Beginning before January 2007, and continuing through July 2010, in the Fort Worth Division of the Northern District of Texas and elsewhere, defendants **Terrance Henderson, Yasmine Villasana, Thaddeaus Henderson, and Kandra McKinney**, and others known and unknown to the Grand Jury, did combine, conspire and agree to commit offenses against the United States, to wit, violations of 42 U.S.C. § 408(a)(7)(B), that is, with the intent to deceive, to falsely represent a number to be the social security account number assigned by the Commissioner of Social Security to the defendant or a conspirator, when in fact such social security account number was not assigned to the defendant or a conspirator.

Manner and Means of the Conspiracy

It was part of the manner and means of the conspiracy that:

3. **Terrance Henderson** and others devised a scheme to defraud T-Mobile by purchasing service contracts with T-Mobile in which they would receive a free or discounted cellular phone. The defendants would then sell the cellular phones for a profit.

4. Before going to retailers to purchase service contracts, the defendants had to qualify for credit. In order to qualify for credit, the defendants used stolen and personal identification information. One of the defendants obtained social security numbers and personal identifiers belonging to other individuals not involved in the conspiracy.

Using these stolen social security account numbers and personal identifiers, **Terrance Henderson** and others contacted T-Mobile to get pre-approved credit checks.

5. Based on the credit checks, **Terrance Henderson** then supplied **Yasmine Villasana**, **Thaddeaus Henderson**, and **Kandra McKinney** with those stolen social security numbers belonging to individuals with common names or names similar to the defendants. All of the listed defendants then went to retailers including Wal-Mart, Best Buy, and Radio Shack to purchase service contracts with T-Mobile and obtain free or discounted cellular phones.

6. From January 2007 through July 2010, **Terrance Henderson**, **Yasmine Villasana**, **Thaddeaus Henderson**, **Kandra McKinney**, and others purchased multiple cellular telephone service contracts with T-Mobile from Wal-Mart stores, Best Buy, Radio Shack, and Sam's stores and acquired multiple cellular handsets. The defendants purchased multiple subscriptions and acquired multiple cellular handsets with each social security account number.

7. During the course of the conspiracy, the defendants, using stolen social security numbers acquired more than 1,000 cellular phones.

Overt Acts in Furtherance of the Conspiracy

8. In furtherance of the conspiracy and to achieve the objects thereof, the following acts were committed:

a. On or about May 28, 2010, **Yasmine Villasana** used TX DL [redacted]27 and another individual's social security account number (SSAN) [redacted]6728 to purchase two phones at Wal-Mart, located at 1732 Precinct Line Road, Hurst, Texas.


b. On or about November 24, 2009, **Kandra McKinney** used TX DL [redacted]05 and another individual's SSAN [redacted]3799 to purchase two phones at Wal-Mart, located at 915 East Randol Mill Road, Arlington, Texas.

c. On or about January 12, 2010, **Thaddeaus Henderson** used TX DL [redacted]87 and another individual's SSAN [redacted]2032 to purchase five phones at Wal-Mart, located at 8520 North Beach Street, Fort Worth, Texas.


d. On or about July 5, 2010, **Terrance Henderson** used TX DL [redacted]12 and another individual's SSAN [redacted]0878 to purchase three phones at Wal-Mart, located at 1401 S. Cherry Lane, White Settlement, Texas.

All in violation of 18 U.S.C. § 371 (42 U.S.C. § 408(a)(7)(B)).

A TRUE BILL


FOREPERSON

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INDICTMENT

18 U.S.C. § 371(42 U.S.C. § 408(a)(7)(B))

Conspiracy to Commit Social Security Fraud

A true bill rendered:

DALLAS

Angela Bland FOREPERSON

Filed in open court this _____ day of June, A.D. 2014.

Defendants Terrance Henderson (01) and Yasmine Villasana (02) in custody; Defendant's Thaddeaus Henderson (03) and Kandra McKinney (04) on Pretrial Release

Erica Campbell Ramey
UNITED STATES MAGISTRATE JUDGE
(Magistrate Case Number: 4:14-MJ-244)